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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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MEMORANDUM

DATE: June 10, 1999

TO: Chuck Gunnarson, DLC

FROM: *Tim Zook*
Tim Zook, DWPC/FOS - Springfield Region

SUBJECT: South Central Terminal / Edwards Farm Supply May 3, 1999, Site Visit;
Pana (Christian County) IEPA/USEPA Joint Inspection

A joint inspection of the subject facility commenced at approximately 10:30 a.m. on May 3, 1999. Agency personnel present were Bud Bridgewater (DWPC/FOS - Springfield Region Manager), Bruce Everetts (BOL/DRM/RPMS), Dave Jansen (DLPC/FOS - Springfield Region Manager), Rich Johnson (DLPC/FOS - Springfield Region), Tim Kluge (DWPC/FOS - Manager), and the author. Kevin Turner, the USEPA Designated On-Scene Coordinator, met the Agency representatives at the site. Bill Gandy, of the Christian County Health Department, was also present for a portion of the inspection. It was sunny on May 3, with a temperature of approximately 75 °F. Soil conditions were dry.

The main purpose of the May 3 inspection was to familiarize Everetts and Turner with South Central Terminal. Because of this, many of the buildings were entered and considerable time was spent discussing the history of the site. *This memorandum focuses on the ammonium sulfate issues that have become apparent since Larry Edwards reportedly assumed ownership of the site in 1998. However, the first three numbered items concern activities other than ammonium sulfate.* No samples were collected. The only photographs taken were in the vicinity of the old asphalt plant, on the west portion of the South Central site, where it was discovered that a tar-like substance had recently leaked from a tank that had not been described previously. Prior to May 3, the most recent inspection had been conducted by Rich Johnson, accompanied by Karen Nelson, on April 29, 1999. My last previous inspection had been on April 19, 1999.

Items noted during the May 3 inspection are listed hereafter. Refer to Attachment #1, a map of the site, for additional information. Photographs taken during the inspection are included as Attachment #2. Attachment #3 is a copy of a page of a "log book", submitted by Larry Edwards subsequent to the inspection, in which he describes his observations and activities on May 1 and 2, 1999.

South Central Terminal / Edwards Farm Supply

May 3, 1999, Site Visit

Page 2

1. Much of the Wagner Castings Company (Wagner) foundry waste had been removed from the site, though substantial amounts remained. Large bags of Wagner waste materials were on the ground in the area north of Tank 118. Piles of Wagner waste materials were on the ground in the area west of Tank 119. *Mr. Brent Locke, President of L & R Container Service, Inc., was at the site for a short time and spoke with Dave Jansen. According to Jansen, Locke indicated that L & R had been hired by Wagner, to take the foundry waste to a permitted landfill.*
2. In the north portion of the site was evidence that demolition activities had commenced again. A tank-like structure was on its side, with its top removed. *In the Agreed Preliminary Injunction Order entered on December 21, 1999, Edwards had agreed to cease and desist from demolition activities without first filing a completed Notification of Demolition or Renovation with the Illinois EPA.*
3. In the area of the old asphalt plant, in the west portion of the site, a tank (estimated at 20 feet in height with a diameter of approximately 8 feet) was found to have recently leaked a tar-like substance onto the ground. Pools of this substance existed around the tank. A trail of the tar-like substance ran for approximately 50 yards, to the southwest. Refer to the Photographs in Attachment #2 for additional information. In a copy of a "log book" later submitted, Larry Edwards indicated that he had discovered the leak on May 2, and had used an endloader to try to contain the substance. He also stated, "... looks like someone has taken a railroad tie and broke off valve on a small tank (all by itself) and tar or road oil has run out. . ." Refer to Attachment #3.
4. Tanks 19, 37, 117, 118, and 119 were all surrounded or mostly surrounded by what appeared to be mixtures of ammonium sulfate and stormwater runoff. *Moderately strong, unpleasant organic odors were noted wherever pools of these mixtures existed. The odors were the most evident close to the five-tank bermed area, where the most liquid existed on the ground. The area surrounding Tank 119 had a swamp-like appearance, with shallow (up to several inches in depth) pools of water and large numbers of cattails growing. The pools of liquid were considerable deeper, probably up to at least two feet in depth, nearer the other four tanks in this area. Approximately 1.5 to 2 feet of freeboard existed southeast of Tank 37. Southwest of Tank 19, freeboard was also estimated at 1.5 to 2 feet.*
5. A portable pump (Honda trash pump WT40X) was set up on the gravel/dirt access road between Tanks 116 and 117. The inlet hose for the pump was submerged in dark liquid, within the bermed area northeast of Tank 37. The outlet hose was connected to a series of permanent pipes and valves, on the east side of the access road, that appeared to exist from the site's use as an oil refinery. It appeared that these pipes and valves would convey flows towards Tanks 115 and 116.

6. The valve at the southeast corner of the dike system, southeast of Tank 37, still did not have a blind flange on it, though the wire (or cable) lock was in place. A pool of dark liquid surrounded the outlet end of the valve, with the liquid level high enough that the outlet was submerged. A long thin pool of dark liquid still existed along the fence line south of Tank 37, though this pool was considerably smaller than I had observed during my previous inspection, on April 19. An earth barrier existed between the long thin pool and the pool surrounding the valve. In contrast to my previous inspection, no liquid was seeping either over or through this barrier.

A series of dark pools of liquid led to the southeast corner of the site. Liquid was seeping over the top of the small pile of earth, that had been placed in the pathway of the flow.

7. The triangular shaped pool of water in the southeast corner had a surface area estimated at approximately 120 feet along the north/south fence by 120 feet along the east/west fence. Large numbers of cattails were growing in the more shallow parts of the pool. The liquid had the dark color and unusual odor consistent with substantial amounts of ammonium sulfate material. Portions of the surface were covered with a gray-white film. Approximately 3 inches of freeboard existed at the time of the inspection. Though no flowrate was visible, it was obvious that liquid had seeped from the ponded area (inside of the fence) to the outside of the fence. Small pools of dark liquid existed outside the fence in the area of the former gap in the berm, as well as approximately 10 feet to the north.
8. A sheet of flexible synthetic material, intended to be a blind flange, was still bolted to the outlet of the valve at the southwest corner of the dike system, southwest of Tank 19. The wire (or cable) lock was in place. Small pools of dark liquid existed just outside of the outlet, though the outlet itself was dry. It appeared that ammonium sulfate/stormwater runoff mixtures were seeping either through the valve, on the inside of the blind flange, or around the valve. A trail of dark liquid, stained grass, and dead vegetation led off site. This trail divided into two parts. The main trail led to a ravine tributary to Coal Creek, near the southwest portion of the Pana STP, while a secondary trail dissipated in the area north of the Pana STP.

The main trail contained several pools of dark colored liquid, with a slow but steady flowrate noted towards the ravine. The amount of liquid gradually dissipated as the ravine was neared, with the last pooled area ending approximately 30 feet before the ravine. Large areas of dead vegetation existed.

The secondary trail dissipated prior to entering any streams. Pools of dark liquid existed in some of the vehicle ruts that this trail led to.

9. The portable trailer-mounted metal tank, with a nameplate capacity of 700 gallons, still existed on the ground northwest of Tank 119.
10. Tank 32 was leaking. The gauge on the side of the tank indicated that it contained approximately 7'-1/4" of liquid. *During a follow-up inspection on June 7, it was found that Tank 32 contained considerably more material, and that the gauge was therefore not accurate.* A thin steady stream of liquid was leaking from the bottom of the manway. When a 16-ounce glass jar was placed under the leak, the jar filled in approximately 2 minutes, which gives an estimated rate of approximately 90 gallons per day. Pools of dark liquid, which appeared to be mostly ammonium sulfate material, existed on the ground within the bermed area. *After returning to the Region Office on the afternoon of May 3, I called the telephone number I had been given for Larry Edwards (217/669-2144). I left a message that the Agency had just been to the site and found Tank 32 to be leaking. As of this writing, Edwards has not returned my call.*
11. There was no longer an operable portable pump in place north of Tank 118. The Honda trash pump that I had last observed, on April 19, and Rich Johnson had last observed, on April 29, had been moved to a location between Tanks 116 and 117. On May 3, another portable pump, with a 5 HP Briggs & Stratton motor, was sitting east of where the Honda trash pump used to be located. However, the Briggs & Stratton pump was not connected to anything.
12. The ditches south and west of Tank 32 contained what appeared to be mixtures of ammonium sulfate and stormwater runoff. Liquid with the same appearance also existed in the ditches north of Tanks 117 and 118, and west of Tanks 111, 113, 110, and 116. *Several trenches had recently been constructed across various access roads. Some of these trenches are shown on Attachment #1. The purpose of these trenches was not clear, at the time of the inspection. However, in a copy of the "log book" that Larry Edwards later submitted, he indicated that the trenches (he used the term ditches) were dug on May 2, to restrict vehicle traffic. In the new trench west of Tank 31, liquid was flowing steadily from east to west, across the road. It appeared that the new trenches that had been constructed would cause ammonium sulfate/stormwater runoff mixtures to leave the site in greater amounts and more rapidly than they would have otherwise.*
13. It was difficult to read the Tank 119 level gauge, due to moisture inside the glass face. However, it appeared to indicate a level depth of approximately 10'-7 1/4". This was an increase over the 8'-6 1/4" noted during Johnson's April 29 inspection.
14. The liquid in the west impoundment area had a turbid brown appearance. Small patches of algae were also apparent. *A pile of earth had recently been placed so as to block the cracked concrete tile, approximately 18 inches in diameter, that formerly discharged into*

the inlet (east) end of the west impoundment. A small pool of murky water, approximately 10 feet long by 5 feet wide, existed near where the tile outlet used to exist. It is possible that the outlet was mostly blocked, but some liquid still was able to seep to the surface. I can think of no purpose for the recent excavation, other than to attempt to block discharges to the west impoundment. The excavation did not appear to be mentioned in the copy of the log book that was submitted by Edwards, though his writing is difficult to read.

15. The water in the East API Unit had a brown, very murky appearance when viewed from above. The appearance was consistent with a mixture of ammonium sulfate and stormwater runoff. Small patches of duckweed were scattered on the surface. A small amount of an oily appearing film also existed. However, the water being discharged (seeping) out of the outlet of the separator was clear. Clear water was also being discharged out of the pipe west (inside of the fence) of the small brick outlet structure, as well as from the brick outlet structure itself (outside of the fence). The three discharges combined in a ditch outside (east of) the fence, and flowed to the south, past the pool of ammonium sulfate material/stormwater runoff in the southeast corner of the site.
16. As shown on Attachment #1, the ditch that receives the discharges just described is tributary to a series of culverts and ditches that ultimately cross under State Route 51, to the east, and then reach Coal Creek.

We left the site at 1:10 p.m.

TDZ/c:\epa\200\chrstn\socn.10

Attachments (3)

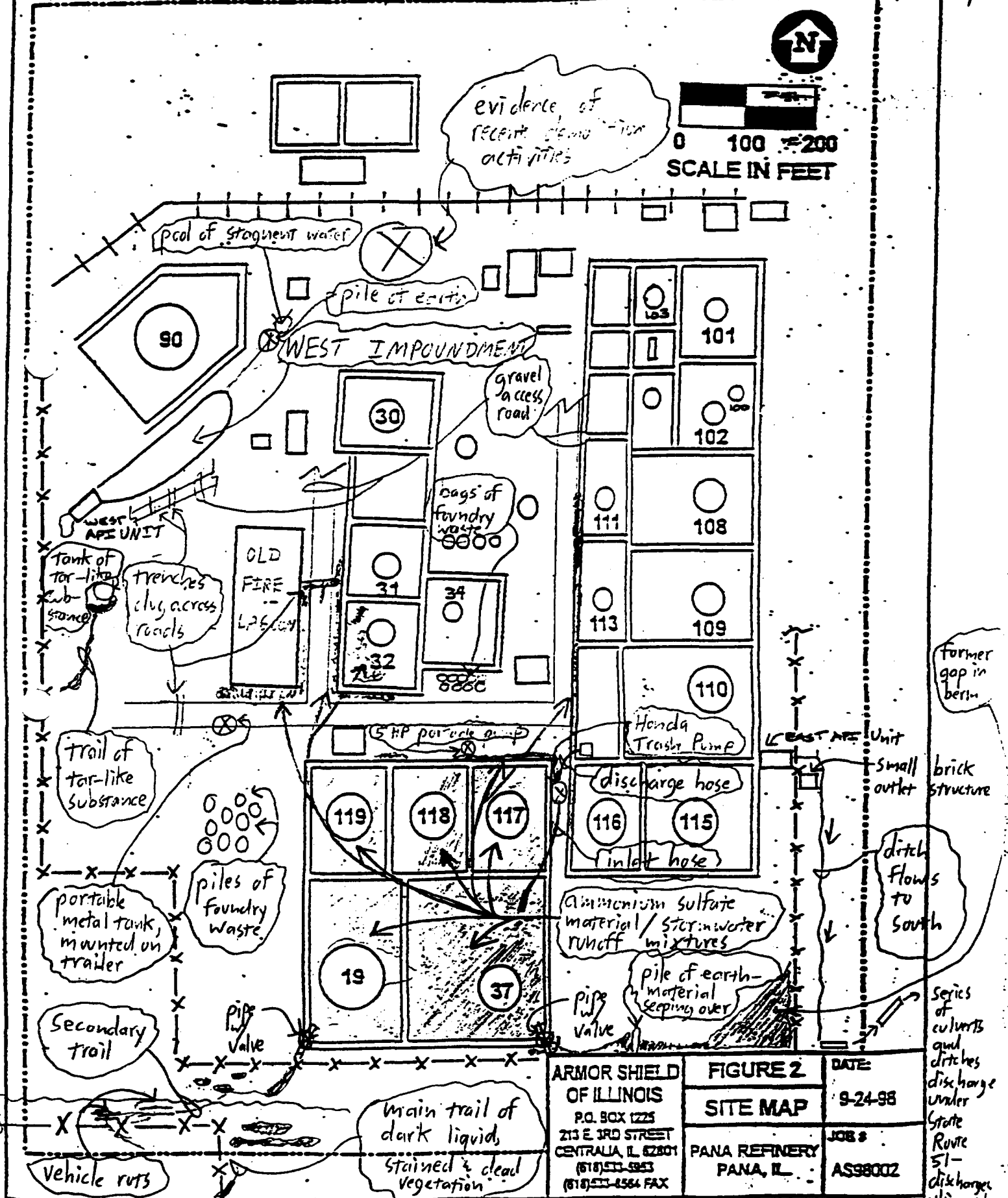
cc: Dave Jansen/Rich Johnson, DLPC/FOS - Springfield Region
Greg Richardson, DLC
John Sherrill, BOL/DRM/RPMS
Desiree Peri, Office of the Attorney General
Kevin Turner, USEPA Region 5
DWPC/FOS/RU (w/photographs)
DWPC/FOS - Springfield Region (w/photographs)
(photographs also included with the original)

South Central Terminal/Edwards Site

Attachment - #1

Site Map / Conditions at time of inspection

May 3, 1999, inspection
10:30 a.m. → 1:10 p.m.



Note: This map was prepared by Armor, Shield, to show the locations of monitoring

South Central Terminal/Edwards Site
May 3, 1999, Inspection - Photographs

Attachment #2, p. 1 of 5
10:30 a.m. → 1:10 p.m.



Date of Photograph: 5-3-99 Time of Photograph: 10:30 a.m. → 1:10 p.m.

Location of Area Photographed: area west of old asphalt plant-
facing west towards tank that recently leaked tar-like substance

Photograph Taken by: TDZ Photo # 1



Date of Photograph: 5-3-99 Time of Photograph: 10:30 a.m. → 1:10 p.m.

Location of Area Photographed: Same as Photo #1 - close-up of tank
(tank estimated at approximately 20 feet in height, with a diameter
of approximately 5 feet)

Photograph Taken by: TDZ Photo # 2

South Central Terminal/Edwards Site
May 3, 1999, Photographs

Attachment #2, p. 2 of 5.
10:30 a.m. → 1:10 p.m.



Date of Photograph: 5-3-99 Time of Photograph: 10:30 a.m. → 1:10 p.m.

Location of Area Photographed: area west of old asphalt plant - facing
NE towards asphalt plant tanks, evidence of recent earthwork

Photograph Taken by: TDZ Photo # 3

South Central Terminal/Edwards Site
May 3, 1999, Photographs

→ Match
Photo #6



→ Match
photo #6

DATE OF PHOTOGRAPH: 5-3-99 TIME OF PHOTOGRAPH: 10:30 a.m. → 1:10 p.m.
LOCATION OF AREA PHOTOGRAPHED: standing south of tank that leaked, Facing SW
PHOTOGRAPH TAKEN BY: TPZ No. 4 & 5

Attachment #2, p. 3 of 5
10:30 a.m. → 1:10 p.m.

South Central Terminal/Edwards Site
May 3, 1999, Photographs

Attachment #2, p. 4 of 5
10:30 a.m. → 1:10 p.m.

Match
Photo #5 ←



Match
Photo #5 ←

Date of Photograph: 5-3-99 Time of Photograph: 10:30 a.m. → 1:10 p.m.

Location of Area Photographed: standing south of tank that leaked, facing west

Photograph Taken by: TDZ Photo # 6



Date of Photograph: 5-3-99 Time of Photograph: 10:30 a.m. → 1:10 p.m.

Location of Area Photographed: standing south of tank that leaked, facing west (Photo #7 taken approximately 20 feet north of Photo #6)

Photograph Taken by: TDZ Photo # 7

South Central Terminal / Edwards Site
May 3, 1999, photographs



Attachment #2, p. 5 of 5
10:30 a.m. → 1:10 p.m.

DATE OF PHOTOGRAPH: 5-3-99 TIME OF PHOTOGRAPH: 10:30 a.m. → 1:10 p.m.

LOCATION OF AREA PHOTOGRAPHED: standing just south of tank that leaked, facing NW
pools of tar-like substance visible under vegetation

PHOTOGRAPH TAKEN BY:

IDZ

No. 8 & 9

PREPARED BY	
DATE	

page from Log Book,
Submitted by Larry Edwards

5-1-99 - around Pond - 9:30 AM.

started pumping material only well did not #119

inspected dikes - taken tried to repair some of the damage
done by vehicle to the levee and dikes -

left Pond - 10:30 PM

5-2-99 - around Pond 11:00 AM - took and look and dig

a sump in NW corner of pit in area of tank #118 - so liquid
would drain into it - have gotten most of liquid out of this area

finished pumping all liquid I could get out of this area - moved
pump in line between tank #116-118 to pump liquid out of
area at tank #37 into tank #116

in wall around inspection - went side on top of hill - broke like

someone has taken a railroad tie and broke off valve on a
small tank (all by itself) and the oil has run out -

I took end loader and scraped up dirt to try to contain it
a lot of the material had already seeped (the road oil)

have ran over again - vehicle up & down dikes - have to
stop it - took end loader - dug ditches across roads

that are unnecessary for sand trucks - dug ditches across

lanes that have have across - piled ditches dikes to

keep vehicle traffic from using the dikes area road track -

I hope this stops some of the destruction that has been

luckily done by drivers - I have no idea in the wall how
many keep to the front get the count then -